

preferences, and the decision engine disclosed by Sammon generates a list of one or more products, ranked according to user preferences. See Sammon, Abstract, Col. 2, lines 7-11. Sammon further discloses presenting the user with a sequence of prompts to provide preferences and requirements. See Sammon, Col. 3, lines 43-46. Thus, by focusing on user provided preferences, Sammon fails to disclose or suggest ranking the options within each commodity category based, in part, on at least one optimization parameter, wherein optimization parameters include at least one of a utility function, a constant, a supporting statistic, and a cost of the option.

Jacobs describes storing, selectively retrieving, and providing product images, video data, and audio recordings based on customer entered criteria. See Jacobs, Abstract, Col. 1, lines 7-11. Jacobs further discloses selectively retrieving product data that can use a relatively small database of product designs, and allowing the customer to combine various components of product components of his choice and replace parts of the design with parts that better suit his needs. See Jacobs, Col 2, lines 43-45 and 50-55. Jacobs also fails to disclose or suggest ranking the options within each commodity category based, in part, on at least one optimization parameter, wherein optimization parameters include at least one of a utility function, a constant, a supporting statistic, and a cost of the option. Therefore, Applicant submits that the suggested combination of the cited art does not render the claimed invention obvious.

Applicant further submits that it would not have been obvious to one of ordinary skill in the art to modify Sammon to achieve the claimed invention. The law is clear that a proposed modification cannot change the principle of operation of the cited reference. Both Sammon and Jacobs focus on user provided preference criteria, and fail to explicitly describe ranking the options within each commodity category based, in part, on at least one optimization parameter, wherein optimization parameters include at least one of a utility function, a constant, a supporting statistic, and a cost of the option. Thus, interpreting any of the cited references as disclosing such a determination of a coordinate would be changing the principle of operation of each of the references, or combination thereof. Again, Applicant respectfully submits that the suggested combination of the cited art does not render the claimed invention obvious.



Application No.: 9/580,448

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Docket No.: 08202/1200001-US1

Dated: January 5, 2004

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